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GREAT FALLS DIV.  
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IN THE UNITED STATES DISTRICT COURT, DISTRICT OF MONTANA  
GREAT FALLS DIVISION

LORNA STREMCHA,

Plaintiff,

vs.

HILL COUNTY SCHOOL  
DISTRICT NUMBER 16,  
BOARD OF TRUSTEES OF HAVRE  
PUBLIC SCHOOLS,  
KIRK MILLER, an individual,  
VANCE BLATTER, an individual  
BARRY ZANTO, an individual,  
KARLA WOHLWEND, an individual,  
CONNIE PETERSON, an individual,  
RICHARD D. FLOREN, an individual,  
DENNIS J. PARMAN, and,  
DOES 1-10 inclusive,

Defendants.

Cause No. CV-04-22-GF-SEH

EXPERT WITNESS REPORT  
OF AMY OPPENHEIMER

## I. BACKGROUND

I have been retained on behalf of the plaintiff, Lorna Stremcha to render an opinion of the defendants' actions in preventing, responding to and investigating plaintiff's complaints of workplace harassment/discrimination, to what is considered typical and acceptable human resource practice in regard to preventing and responding to harassment in the workplace and to what reasonable steps should be taken to prevent and respond to retaliation for making a complaint of harassment/discrimination. I have been an attorney for over twenty-four years. For more than thirteen years I have trained employers and employees in preventing and responding to harassment and discrimination, consulted on harassment and discrimination policies, acted as a neutral investigator of charges of discrimination in employment, and testified as an expert witness in retaliation, discrimination and harassment cases. From 1986 to 1990 I investigated EEO complaints for federal government agencies. I co-authored a book about investigating workplace harassment, entitled: *Investigating Workplace Harassment: How to be Fair, Thorough and Legal*, published in 2002 by Society for Human Resource Management. Since 1992 I have also served as an Administrative Law Judge for the State of California. My CV, rate sheet and list of cases I have testified in are attached. My current rate for reviewing documents and preparing a report is \$300/hour however I have agreed to lower my rate to my former rate of \$250/hour for this case.

My understanding is that discovery has not yet closed and therefore I have not yet had an opportunity to review all of the evidence in this case. Furthermore not all of the depositions that have been taken have been transcribed. Hence my opinions are preliminary and may be augmented after further discovery is completed.

## II. MATERIAL REVIEWED

I have reviewed the following materials in forming my opinion:

- a. Deposition Exhibits Volumes I and II
- b. Deposition of Lorna Stremcha, Volumes I and II, with documents attached
- c. Deposition of Vance Blatter
- d. Deposition of Kirk Miller
- e. Deposition of Karla Wohlwend
- f. Deposition of Catherine Anne Kimball-Williams
- g. Deposition of Connie Peterson
- h. Deposition of Lyle Dille
- i. Deposition of Richard D. Floren
- j. Deposition of Don Holden
- k. Deposition of Doug Komrosky
- l. Deposition of Dana Birkoski
- m. Plaintiff Exhibits 1 - 100
- n. Documents responsive to Request for Production No. 16
- o. Documents responsive to Request for Production No. 25
- p. Documents responsive to Request for Production No. 26
- q. First Amended Complaint for Damages and Demand for Jury Trial
- r. Answer to First Amended Complaint
- s. Second Amended Complaint for Damages and Demand for Jury Trial
- t. Plaintiff's First Amended Complaint (State Court)
- u. School District's Answer to First Amended Complaint (State Court)
- v. Defendants' Initial Disclosure Statement
- w. Plaintiff's Pretrial Conference Statement
- x. Plaintiff's Rule 26(a) Disclosure
- y. Defendant's Preliminary Pretrial Statement

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3 PLAINTIFF'S FOUNDATIONAL OBJECTIONS TO DEFENDANTS' LIST OF  
4 EXHIBITS

5 **III. OPINIONS**

6 **1. Defendant Hill County School District Failed to Act Consistently with**  
7 **Proper Human Resource Practice in its Response to Plaintiff's Complaint of**  
8 **April 2002.**

9  
10 It is appropriate human resource practice to respond to complaints of workplace  
11 harassment and/or potential violence by conducting a prompt, neutral and thorough  
12 investigation of the matter and, based on that investigation, coming to a reasoned conclusion  
13 and taking appropriate remedial action.

14  
15 On April 16 2002 Plaintiff Stremcha put defendant on notice that she felt threatened by  
16 Mike McKelvey's actions towards her that day. The next day she also let defendant know that  
17 she felt their response to her complaint was inadequate. Specifically she voiced concern over  
18 being blamed for the incident and teased about it.

19  
20 Superintendent Miller conducted an investigation of this matter. Although it was  
21 somewhat delayed, it was reasonably thorough. However Miller's conclusions did not  
22 reasonably reflect the evidence he had collected and the remedial action taken was not  
23 sufficient to respond to the situation. In these respects the investigation was flawed.

24  
25 Specifically, Miller found that the administration responded appropriately despite his  
26 finding that Stremcha was affected by the incident and the undisputed evidence that Principal  
27 Vance Blatter had minimized the incident and made statements that tended to blame Stremcha  
28

1 (the victim in this situation). No disciplinary action was taken against Blatter despite his  
2 insensitivity and the finding that Blatter must take care in making statements to a staff member  
3 who reports to him.  
4

5 Blatter, by his own admission, did not believe that any action needed to be taken, even  
6 after receiving Stremcha's letter detailing her concerns. Nor did Miller ask him about this  
7 during the investigation. Blatter testified at his deposition that nothing would have led him to  
8 believe that Stremcha's rendition was accurate, citing the fact that a few teachers said Stremcha  
9 was laughing. His misunderstanding that as Stremcha's supervisor and the person in charge of  
10 the school that he could simply discount Stremcha's concerns in favor of his own (biased)  
11 observations is indicative of a lack of understanding as to his role in assuring that a neutral  
12 investigation take place. It appears that to this day he does not understand this.  
13

14 There was also evidence that Blatter or Zanto made inappropriate comments about  
15 Stremcha to others - Donovan (surly a credible witness) states he was told that Stremcha had  
16 "gone crazy". Yet neither Blatter nor Zanto were held accountable for this.  
17

18 Clearly, staff was becoming polarized about this, which often leads to the complainant  
19 being retaliated against. Nothing was done to manage this situation and in fact some actions of  
20 Miller exacerbated the problem. For example, when he questioned Blatter and Barry Zanto he  
21 told them there had been a complaint regarding their handling of the situation, which in all  
22 probability put them on the defensive immediately. He did not need to do this and he could  
23 have (and should have) investigated the matter in a way that did not indicate that a complaint  
24 emanated from Stremcha. This would have assisted in preventing polarization and Stremcha  
25 being blamed for complaining about her supervisors.  
26  
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1 The staff that was questioned seemed to know that Stremcha had complained and were  
2 taking sides regarding the legitimacy of the complaint. Again, this was a situation that Miller  
3 should have tried to avoid and should have managed when it was clear it was occurring. The  
4 result was that many staff minimized what happened and Stremcha's response. There were  
5 references to an allegation that Stremcha appeared "flattered" and to be laughing about the  
6 matter was discussed by a number of people, leading to co-workers and supervisors having an  
7 attitude that she had somehow caused the incident or was in some way to blame. This has the  
8 effect of re-injuring the victim. In fact, feeling blamed for being a target and not feeling  
9 supported by one's employer is often more traumatic to victims than the initial behavior that  
10 caused the complaint.  
11  
12

13 In this case Stremcha had a history of complaining about not being protected by the  
14 administration (regarding abusive treatment by students) and had her own history of sexual  
15 abuse. The McKelvey incident was an opportunity for the administration to make plaintiff feel  
16 taken care of and protected. There were a plethora of responses and actions they could have  
17 taken to do this, but they failed to do any of them. Instead they made her feel vulnerable and  
18 belittled and did not take action to prevent her feeling ostracized and retaliated against for  
19 complaining.  
20  
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## 22 **2. Defendant's Response to Plaintiff's complaints in the Fall of 2002**

### 23 **Were not Consistent with Appropriate Human Resource Practice.**

24 When Stremcha returned to work in the Fall of 2002 she immediately was bombarded  
25 with actions that reasonably appeared to her to be retaliatory. She had just filed an action with  
26 Montana Human Rights, based on her good faith belief that she had been sexually harassed and  
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28

1 retaliated against. As soon as she started back to work she discovered hardcore pornography  
2 on her computer. Ultimately this computer caught on fire.

3  
4 Also that Fall, parents began requesting that Stremcha not teach their children.  
5 Despite defendants' arguments to the contrary, the evidence was that in prior years only a  
6 handful of parents had made such a request and that such requests are made concerning all  
7 teachers, to some extent. There was no evidence that requests regarding plaintiff were any  
8 more than normal, until the incident in April 2002. Given the stress Stremcha was under and  
9 the polarization at the school, (that was no doubt obvious to parents as well as staff), it is not  
10 surprising that parents began asking that their children be taken out of her class. Defendant,  
11 rather than acknowledge it's own role in failing to provide support for Stremcha and in  
12 allowing staff to be at war with each other, took the concerns as solely Stremcha's fault and  
13 began a campaign of collecting evidence against her that would inevitably lead to her  
14 termination.  
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17 This was not the only alternative. Defendant could have provided Stremcha (who had  
18 taught there for ten years and had an excellent record of employment) some accommodation  
19 including time off and/or a transfer to another school where she could have a fresh start.  
20 Instead, they bombarded her with complaints, from everything to the old and trivial to the  
21 significant, causing her to become defensive about everything that came at her.  
22

23 In November 2002 defendants met with Stremcha and subsequently disciplined her  
24 concerning six parent/teacher complaints. There was never an independent investigation into  
25 the validity of the complaints or whether there was a relationship between the complaints,  
26 along with the manner in which they were handled, and her own complaints of harassment and  
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1 discrimination. For example, at the November 12 meeting Blatter presented her with a list of  
2 concerns he had written out before the meeting, stating that he had decided before speaking to  
3 Stremcha that the allegations were true. In December 2002 she was disciplined for three  
4 different actions with students one of which involved students who wanted to retract the  
5 complaint. Blatter determined that the retraction was not genuine and the initial complaint was  
6 valid however, yet again, no neutral party investigated this. Rather, Blatter, whom Stremcha  
7 had complained about, acted as investigator and prosecutor.  
8

9  
10 Throughout that fall Stremcha was disciplined for a barrage of complaints, some of  
11 which were trivial and not the sort of complaint that would normally lead to discipline (for  
12 example telling a student not to mope around or being present when students complained about  
13 another teacher and therefore handing off the documentation to the administration). No  
14 independent party attempted to speak with her and get her side of the situation and as the  
15 situation devolved, she encountered more discipline for not cooperating with her supervisor  
16 and others above her in the chain of command.  
17

18 **3. Floren's Investigation of Plaintiff's Grievance Was not Consistent**  
19 **with Appropriate Human Resource Practice.**

20 When plaintiff did file a grievance, it was assigned to Floren to investigate. As the  
21 subordinate of the person she was complaining about he was hardly a neutral party or an  
22 appropriate party to do the investigation. Furthermore the investigation was totally inadequate.  
23 Rather than interview witnesses and come to his own conclusion, Floren relied on what he was  
24 told by Blatter and Wohlwend and on another investigator's report (Strowd from Montana  
25 Human Rights) without verifying the accuracy of that report. In fact the Strowd report was  
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1 largely based on assuming that defendants' statements were true without her doing her own  
2 independent investigation either. Thus unverified statements became the truth without anyone  
3 doing a neutral and independent investigation of the matter.  
4

5 **4. Defendants' Termination of Plaintiff's Employment was Inconsistent**  
6 **With Appropriate Human Resource Practice**

7 By the Spring of 2003 defendant was engaged in an all out effort to gather any evidence  
8 it could against plaintiff without concern for her side of the situation or who was dragged into  
9 this dispute. The School District's relationship with Stremcha had become fully adversarial.  
10 Karla Wohlwend was instructed to call parents to gather complaints and not to get Stremcha's  
11 side or investigate the matter. The so-called "investigative" hearing conducted by Miller was  
12 not an investigation at all but rather was an adversarial hearing with Miller acting both as  
13 interrogator and witness. This becomes abundantly clear when Miller cross-exams Stremcha  
14 about statements she made to him and determines that any denial of what he says she said  
15 would not be credible since he knows what happened. Clearly he was not, nor could he have  
16 been at that point, in the role of a neutral investigator. The transcript of this proceeding was  
17 then used in the ultimate decision to terminate Stremcha.  
18  
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20 The letter recommending termination emphasized insubordination, much of which was  
21 caused by the adversarial nature of the employment dispute, unprofessional interactions with  
22 staff and administrators, which was also caused by the dispute and which many of those  
23 involved were equally responsible for (yet not held accountable) and outdated and/or  
24 unsubstantiated complaints. The conclusion that Stremcha had lost the confidence of the  
25 administration and was no longer effective as a teacher leaves out the fact that the  
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1 administration had orchestrated this result and it's actions could not be separated from them.

2 The reality is that no teacher could be effective under those conditions.

3  
4 From a human resources perspective, what stands out are all the things that could and  
5 should have happened that might well have led to a different result. This starts with a rigorous  
6 response to Stremcha's complaints about not being adequately protected from harassment,  
7 which first arose as far back as 2000 and surfaced again in April 2002. Such a response would  
8 not have blamed the victim or polarized those involved. Then, in the beginning of the  
9 2002/2003 school year there would have been a rapid response to the concern about the  
10 pornography, rather than making jokes about it and a determination if the April 2002 incident  
11 was impacting the plaintiff and an inquiry into what steps would address that. Complaints  
12 about her class could have become opportunities to determine why a tenured teacher with a  
13 good record seemed to be struggling and what could be done to assist her rather than an  
14 opportunity to gather evidence in support of a termination. Choices could, and should, have  
15 been made as to which concerns were valid and should be addressed and which were not. This  
16 would have prevented Stremcha from feeling barraged and responding to all the complaints in  
17 the same manner. In short, while defendants made termination a pre-determined result, it need  
18 not have been and if good human resource practices had been applied, the scenario would have  
19 looked quite different.  
20  
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22

## 23 5. The Human Rights Investigation by Strowd was Seriously Flawed

24 The January 27, 2003 investigation completed by Strowd did not appear to be  
25 neutral or unbiased. She credited witnesses who criticized Stremcha and discredited  
26 those who supported her, without any basis for these determinations. She chose to  
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28

1 believe that Stremcha was flattered by McKelvey, based on subjective impressions of  
2 others and despite evidence she was not. In fact in her report she states in was the  
3 "consensus" of witnesses that Stremcha was flattered when clearly there was no such  
4 consensus. In this manner she seems to be going overboard to support the version of  
5 the facts presented by the School District – not a neutral stance. Without talking to  
6 Brittany Birkowski she finds her letter not credible, simply based on what she thinks a  
7 school principal would do or not do. She assumes that there have been the number of  
8 complaints the School District said and that they were valid complaints, without  
9 verifying this in any way. In fact, in going through this list of complaints at deposition,  
10 it turned out many were innocuous and some did not even involve Stremcha. One  
11 parent complaint in the list of complaints was a parent that wanted his/her child in a  
12 different section of Stremcha's class. Many involved a perception that their child  
13 should receive a higher grade.  
14  
15

16  
17 **6. The Human Rights Investigation by Phillips was Seriously Flawed**

18 Plaintiff complained to Montana Human Rights that she was discharged for filing a  
19 Human Rights complaint. The investigation down by Human Rights in response to that  
20 complaint was flawed in many respects. First, most of the witnesses the investigator spoke to  
21 had no direct knowledge of the issues. Second, the investigator provided summaries of those  
22 interviews but no statements. There is no way to validate whether the witnesses said what the  
23 investigator claims they said.  
24

25 Significantly, a primary reason the investigator determines that there was no retaliation  
26 was that since the School District had been successful in the Human Rights complaint it had no  
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1 motive to retaliate. This shows a total misunderstanding of retaliation in the workplace.  
2 Whether a complaint is successful or even valid has no relationship to retaliation. Rather  
3 retaliation can occur regardless of the ultimate findings in the underlying complaint.  
4 Retaliation occurs because (some) employers do not want their employees complaining, not  
5 because of the validity or invalidity of any particular complaint  
6

#### 7 IV. CONCLUSION

8 Defendants' actions in failing to take appropriate action in response to plaintiff's  
9 April 2002 complaint, and thereafter failing to reasonably and neutrally investigate her  
10 complaints of retaliation and failing to take steps to remedy the situation deviated from  
11 standard and customary practice in many significant ways. Defendants acted in a manner that  
12 made termination of plaintiff's employment inevitable, which was contrary to appropriate  
13 human resource practice.  
14

15 RESPECTFULLY SUBMITTED this 14th day of November 2005.  
16

17  
18 

19 Amy Oppenheimer  
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May 2, 2003

To Whom it may concern:

I am writing to inform you of the knowledge I have of actions and statements made toward Mrs. Stremcha, as well as character examples of Mr. Vance S. Blatter.

I am the ex-wife of Mr. Blatter. We were divorced in July of 2001. Mr. Blatter, myself and our two children moved to Havre in July of 1998. Blatter was hired as the Middle school principal, to begin in Aug. 1998.

After approximately three months at the middle school, Blatter would come home and speak about people who, "Need to GO." He was referring to those individuals who he wanted to see no longer employed at the Middle school. The first name that came home was a lady in the office named Sylvia. I later learned her last name was/is Purkett. After a short time, Sylvia was no longer employed at the Middle School. The second name that he talked about disliking greatly was a man by the name of Mike Brady. Blatter would talk about how he was going to make things so miserable for "Brady" that he would not be at the school much longer. After a time, Mr. Brady was let go.

During this time, I recall Blatter saying, "I had some parents complaining about a grade that Mrs. Stremcha had given their kid, **that bitch has to go!!**" I remember thinking there seemed to be more and more people that he appeared to be targeting to get out of the Middle School.

Blatter would sit at home reading the Book of School Law. It appeared that he was set on getting rid of people he did not like.

I recall him talking about a teacher named Mrs. Vincent. For some reason he did not like her as a teacher. He said, "I am going to make her teach something she will hate-I'll show her."

I do not know these people other than from hearing their names mentioned in the district-as I am also a teacher in the district. I am a special education teacher at Lincoln McKinley School.

I would like to share some of the character traits of Blatter:

After 21 years of marriage, I was repeatedly told," I'm sorry you are so mentally ill!!" (I am NOT)

After he became a High School principal in, Joliet Montana he would say to me," IF you had an education, you may be worth talking to!"

Not long after, I went to 4 years of college, received my teaching degree in special education. Blatter's response was, "**You're nothing but a fucking special ed. Teacher!**"

His mental abuse to myself and my children was continuous. He also consumes from 6-20 cans of beer per evening and says he does not have a problem. This can be confirmed by William Boley- a licensed counselor in Havre, Montana.

After I moved from the family residence, Blatter called the Havre Public School personal/Special Education Director to his school office for a visit. He told Mrs. Wohlwend I was not fit to be a teacher and should not be trusted around children. Although Blatter tried to get me fired, Mrs. Wohlwend had done several observations and evaluations of my teaching and disagreed with Blatter's recommendation that I be fired.

Blatter was heard talking to his brother, Blake Blatter, in Livingston, Montana. Blake was telling Vance that if he wanted to kill his ex-wife and cover it up, the best way would be to get on the sheriff's department in Havre. My lawyer, Brian Liletvedt went to the Havre sheriff's office and confirmed that Vance Blatter was a new reserve sheriff. I feel his plan is still in the works. Blatter never stops seeking to destroy other people in one way or another.

I do fear for my position with Havre public schools by writing this letter, however, Blatter will continue to destroy people's lives if someone does not confront him.

## **To Dream the Impossible Dream**

By Jim Elliot, Former State Senator, Trout Creek

Is there a change in taxation in store for Montana's oil and gas industry? There are a couple of legislators who have introduced bills to either rescind a tax break oil companies got in 1993 or impose a sort of surcharge on production. Governor Schweitzer seems to be enthusiastic about the latter. Best of luck, but my money's on the big money. In my 16 years in the legislature I can't remember a time when taxes were increased on oil production, and believe me, I tried. I can, however, remember several times when they have been reduced.

Montana's oil industry has protected itself well from paying taxes by playing the Montana and North Dakota legislatures for suckers, which seems to be what they are. The oil industries of the respective states raise the specter of the loss of jobs and tax revenues of state A if they don't bring their oil taxes in line with state B. The threat being that they will move their oil rigs to the other state. I first discovered this in 1991 while I was researching a tax break the Montana oil industry wanted so that we would be on a "par" with North Dakota taxes. I did something apparently few legislators had done and called the North Dakota Department of Mineral Resources which handles this sort of stuff. "Oh, they're doing that again," said the fellow I reached, "They'll be over here next year to get us to lower our taxes to be in line with yours." This is called a "shell game" in a carnival, but if it works in politics...what the heck.

I have often imagined a mythical "Oilvane", sort of like a weathervane—an oil rig mounted on a turntable--somewhere in Richland County that points the rig towards whichever state they will be moving to if the tax situation isn't addressed to their liking. But it only points East or West, and Wyoming, which is by far the largest oil and natural gas producing state in the area, never gets targeted. Why is that? Is it because (what do you call them, Wyomers, Wyomites, Wyomingers?) the folks in Wyoming have the revealed knowledge that if the petroleum industry doesn't like the taxes in Wyoming they can't pick up their oil and go home. Wyoming has the distinction of getting a lot of oil tax revenue because they actually collect it, and they do it based on sound economic principles.

In 1999, and again in 2001, the Wyoming Legislature paid for studies on the effects of taxation, environmental control, and freight rates on oil, gas, and coal production in Wyoming. The 2002 study is 218 pages long and was sent to me courtesy of the Equality State Policy Center in Casper, Wyoming. It said, in part, that Wyoming could DOUBLE taxes on oil and gas without having a negative effect on state revenue, in fact, it would increase revenue. Well, Wyoming didn't do that, but they didn't lower taxes, either. This is an occurrence of that exceedingly rare phenomenon in a legislative body of favoring fact over fiction. My hat is off to them.

In Montana we have an Oil and Gas Production Holiday which was enacted in Montana in 1993 by Democrats and Republicans alike as an incentive to help the oil industry out in

hard times. Oil was chugging along at between 12 to 14 bucks a barrel, and it was allowed that a tax holiday might keep the oilvane pointing towards North Dakota or maybe even spur new investment. It's interesting to read testimony from the hearing. These guys are good at what they do.

They said that Montana's oil production tax revenues were declining at a rate of 7% a year, and that the best way to slow that decline was to give a tax incentive, "since the discovery of a new major oil field in Montana was unlikely." Interestingly, the area they were talking about is the same area that was to become that "major new oil field" just a couple of years later called the Bakken formation. In light of this, one might suspect that our legislature would want to revisit the tax breaks given the oil folks, but the legislature hasn't gone near it with a ten foot pole, despite the fact that oil prices went up to around \$100 a barrel and the Bakken formation is considered one of the largest oil reserves in the world.

In March 2008 I requested information from the Montana Department of Revenue on tax revenues lost due to oil and gas production tax incentives. Combining the amounts lost to the state and oil production counties the loss amounted to \$94 million in 2005 and \$107 million in 2006. For Montana alone the loss was \$51 and \$56 million respectively. From 2003 through the third quarter of 2007 the total state and county amount was \$332 million. Good luck getting any of it back, but you can always dream.



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Whiners & Weasels**

... which one are you?

TIM O'LEARY

O'LEARY

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ISBN-10: 0-9752638-6-2  
ISBN-13: 978-0-9752638-6-0